

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 05-CV-329-TCK-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

CARGILL TURKEY PRODUCTION, LLC'S RESPONSE TO
STATE OF OKLAHOMA'S JULY 10, 2006 SET OF
REQUESTS FOR PRODUCTION TO CARGILL TURKEY PRODUCTION, LLC.

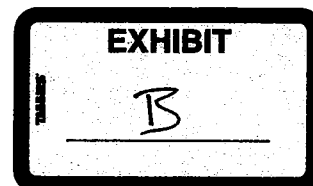
TO:

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GENERAL OBJECTIONS

A. Definitions and Terms: Cargill Turkey Production, LLC ("Cargill Turkey") objects to certain of the words and phrases used by Plaintiff in its document requests as overbroad and unduly burdensome. Such objection includes, but is not limited to, Plaintiff's definition of "Cargill Turkey Production, LLC," "You" and "Your" to include "insurance carriers," which are independent entities not a party to this action. Cargill Turkey also objects to Plaintiff's definition of "documents and materials" to the extent that Plaintiff's definition is inconsistent with the definition of "documents" set forth in Rule 34(a) of the Federal Rules of Civil Procedure.

B. Privileges: Cargill Turkey objects to Plaintiff's document requests as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks to invade information or documents protected by the attorney-client, work product, self-evaluative or joint defense privileges, or any other applicable discovery rule or privilege. Cargill Turkey specifically objects to the production of documents or information in the possession of or obtained from non-testifying consultants or experts who have



been specifically retained to assist counsel for Cargill Turkey with the defense of this litigation as subject to these privileges.

C. Scope; date and geographic range: Cargill Turkey objects to the absence of any reasonable limit to the date range and to the geographic scope in these document requests as overbroad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. Such objection includes but is not limited to the facts that, as currently phrased, Plaintiff's document requests purport to (1) seek information or documents prior to 2002, which Cargill Turkey understands to be the earliest time period allowed by the statutes of limitation applicable to Plaintiff's claims and (2) seek information or documents outside the geographic boundaries of the Illinois River Watershed.

D. Exception to Date Range Objection: Notwithstanding and without waiving the objection asserted in paragraph C, Cargill Turkey will produce all responsive, non-privileged documents (without regard to date) contained in its separately maintained grower files for all growers identified in Cargill Turkey's Answer to Interrogatory No. 1 of the State's First Set of Interrogatories.

E. Option to Produce Documents: Cargill Turkey further objects to these document requests to the extent that they purport to require Cargill Turkey to produce documents in any particular format. Pursuant to Rule 34(b) of the Federal Rules of Civil Procedure, Cargill Turkey will use its discretion in producing responsive, non-privileged documents either (1) as they are kept in the usual course of business or (2) organized and labeled to correspond with the categories in these requests.

F. No waiver of objection or admissibility: In responding to these document requests, Cargill Turkey is asked for and supplies information regarding the existence and location of various documents or other information. In responding to this inquiry, Cargill Turkey is not waiving future objections to either production in discovery or admissibility at trial of any document or information supplied or referred to in discovery.

G. Confidentiality: Cargill Turkey objects to each request as overbroad and unduly burdensome to the extent that it seeks information or documents which contain confidential business or commercial information or proprietary and confidential trade secrets prior to the Court's entry of a Confidentiality and Protective Order.

H. Continuing discovery: In responding to these document requests, Cargill Turkey is supplying all information and documents known to it at this time after a reasonable inquiry. However, discovery is continuing. Should future discovery reveal any further information or documents as to the matters at issue herein, Cargill Turkey will supplement its answers as necessary in accordance with the Federal Rules of Civil Procedure.

Without waiving the foregoing objections, but hereby incorporating each of them by reference in the specific responses as if fully set forth therein, and subject thereto, Cargill Turkey further states and alleges as follows:

RESPONSES TO DOCUMENT REQUESTS

Request for Production No. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW") since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks documents prior to 2002; and seeks information protected by the attorney-client, work product or self-evaluative privileges. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and / or historical feed formulas used at poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all feed formulas and feed delivery tickets from 2002 to present that it has been able to locate as of the date of service of these responses. Cargill Turkey will supplement this response to include other documents "reflecting, referring to or relating to" the ingredients in Cargill Turkey's feed formulas if Plaintiff will narrow this request by providing further specificity as to the particular ingredients about which it inquires and the type of documents sought.

Request for Production No. 3: Please produce all documents and materials reflecting, referring to or relating to any additives or supplements to your present and / or historical feed formulas used at poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections,

Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all feed formulas and feed delivery tickets from 2002 to present that it has been able to locate as of the date of service of these responses. Cargill Turkey will supplement this response to include other documents "reflecting, referring to or relating to" the additives or supplements, if any, in Cargill Turkey's feed formulas if Plaintiff will narrow this request by providing further specificity as to the particular additives or supplements about which it inquires and the type of documents sought.

Request for Production No. 4: Please produce all documents and materials reflecting, referring to or relating to any hormones added to your present and / or historical feed formulas used at poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all feed formulas and feed delivery tickets from 2002 to present that it has been able to locate as of the date of service of these responses. Cargill Turkey will supplement this response to include other documents "reflecting, referring to or relating to" the hormones, if any, in Cargill Turkey's feed formulas if Plaintiff will narrow this request by providing further specificity as to the particular hormones about which it inquires and the type of documents sought.

Request for Production No. 5: Please produce all documents and materials reflecting, referring to or relating to any hormones, medications, antibiotics and / or vaccinations provided or given, presently or in the past, to your birds raised at poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all feed formulas, feed delivery tickets and documents reflecting medication, antibiotics and/or vaccinations provided to its flocks from 2002 to present that it has been able to locate as of the date of service of these responses. Cargill Turkey will supplement this response to include other documents "reflecting, referring to or relating to" hormones (if any), medications, antibiotics and/or vaccinations provided to Cargill Turkey's flocks if Plaintiff will narrow this request by providing further specificity as to the particular hormones, medication, antibiotics and/or vaccinations about which it inquires and the type of documents sought.

* * *

Request for Production No. 6: Please produce all documents and materials reflecting, referring to or relating to the identity of the constituents of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 7: Please produce all documents and materials reflecting, referring to or relating to any reports, studies, analyses, testing, investigations or research of the composition or constituents of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 8: Please produce all documents and materials reflecting, referring to or relating to any reports, studies, analyses, testing, investigations or research of the composition or constituents of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective

order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 9: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 10: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 11: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad,

burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 12: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 13: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 14: Please produce all documents and materials reflecting, referring to or relating to run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry

waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 15: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 16: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill

Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 17: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 18: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 19: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste /

poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 20: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 21: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related

to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 22: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 23: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 24: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 25: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 26: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been stored.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate

confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 27: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 28: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 29: Please produce all documents and materials reflecting, referring to or relating to any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 30: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 31: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 32: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any environmental effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 33: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject

matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 34: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term “effects / impacts”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 35: Please produce all documents and materials reflecting, referring to or relating to any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term “effects / impacts”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 36: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste /

poultry litter / poultry manure (or any constituents thereof) from land or locations on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 37: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "effects / impacts"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 38: Please produce all documents and materials reflecting, referring to or relating to any efforts undertaken by you, directly or indirectly, to evaluate and / or quantify any human health effects / impacts of run-off / discharge / release of poultry waste / poultry litter / poultry manure (or any constituents thereof) from land or locations within the IRW on which poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you has been land applied.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain

the term “effects / impacts”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 39: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the phrase “use of poultry waste/ poultry litter/ poultry manure”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 40: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase “use of poultry waste/ poultry litter/ poultry manure”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 41: Please produce all documents and materials reflecting, referring to or relating to the use of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase “use of poultry waste/ poultry litter/ poultry manure”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 42: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 43: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 44: Please produce all documents and materials reflecting, referring to or relating to the management of poultry waste / poultry litter / poultry manure

produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 45: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the phrase "handling of poultry waste/ poultry litter/ poultry manure"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 46: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase "handling of poultry waste/ poultry litter/ poultry manure"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 47: Please produce all documents and materials reflecting, referring to or relating to the handling of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase "handling of poultry waste/ poultry litter/ poultry manure"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 48: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 49: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and

protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 50: Please produce all documents and materials reflecting, referring to or relating to the storage of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 51: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 52: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these

objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 53: Please produce all documents and materials reflecting, referring to or relating to the disposal of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 54: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 55: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure within or from the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring

to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 56: Please produce all documents and materials reflecting, referring to or relating to the transport of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within or from the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 57: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 58: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are

equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 59: Please produce all documents and materials reflecting, referring to or relating to the land application of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 60: Please produce all documents and materials reflecting, referring to or relating to the location where poultry waste / poultry litter / poultry manure (or any constituents thereof) that has run-off or discharged from land within the IRW has come to be located.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 61: Please produce all documents and materials reflecting, referring to or relating to the location where poultry waste / poultry litter / poultry manure (or any constituents thereof) produced / generated by your poultry growing operations or poultry growing operations under contract with you that has run-off or discharged from land within the IRW has come to be located.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 62: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms "handling" and "use"; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 63: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms "handling" and "use"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 64: Please produce all documents and materials reflecting, referring to or relating to best management practices for the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms “handling” and “use”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 65: Please produce all documents and materials reflecting, referring to or relating to nutrient management practices.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase “nutrient management practices”; seeks documents related to geographic areas outside the Illinois River Watershed; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 66: Please produce all documents and materials reflecting, referring to or relating to nutrient management practices within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the phrase “nutrient management practices”; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and

protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 67: Please produce all documents and materials reflecting, referring to or relating to any actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers pertaining to the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the terms "handling" and "use"; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 68: Please produce all documents and materials reflecting, referring to or relating to any actions (including but not limited to disciplinary actions) you have taken or contemplated taking against any of your poultry growers pertaining to the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms "handling" and "use"; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 69: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad,

burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the term "uses"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 70: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "uses"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 71: Please produce all documents and materials reflecting, referring to or relating to alternative uses or methods of disposal for poultry waste / poultry litter / poultry manure produced / generated by your poultry growing operations or poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the term "uses"; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 72: Please produce all documents and materials reflecting, referring to or relating to correspondence or communication between you and any of your

poultry growers concerning the handling, storage, transport, use or disposal of poultry waste / poultry litter / poultry manure within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms "handling" and "use"; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 73: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 74: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at your poultry growing operations within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 75: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced / generated at poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 76: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the design, specifications, construction, modification and / or maintenance of poultry growing houses issued by you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 77: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the design, specifications, construction, modification and / or maintenance of poultry growing houses issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective

order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 78: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the raising of birds (including, without limitation, the feeding, the house conditions, the provision of preventative medication or vaccinations, the provision of dietary supplements, etc.) issued by you to persons owning or operating poultry growing operations under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 79: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the raising of birds (including, without limitation, the feeding, the house conditions, the provision of preventative medication or vaccinations, the provision of dietary supplements, etc.) issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 80: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership, handling, storage, management, transport and / or disposal of poultry waste / poultry litter / poultry manure issued by you to persons owning or operating poultry growing operations under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; fails to define or explain the terms "handling" and "use"; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 81: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership, handling, storage, management, transport and / or disposal of poultry waste / poultry litter / poultry manure issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the terms "handling" and "use"; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 82: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership of birds (living and dead) issued by you to persons owning or operating poultry growing operations under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 83: Please produce all documents and materials reflecting, referring to or relating to any statements, directives or instructions pertaining to the ownership of birds (living and dead) issued by you to persons owning or operating poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 84: Please produce all documents and materials reflecting, referring to or relating to any grower manuals, guides or hand-outs issued or provided by you to persons owning or operating poultry growing operations under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 85: Please produce all documents and materials reflecting, referring to or relating to any grower manuals, guides or hand-outs issued or provided by you to persons owning or operating poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 86: Please produce all documents and materials reflecting, referring to or relating to any inspection reports / monitoring reports / site visit reports pertaining to poultry growing operations under contract with you within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 87: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Arkansas (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 88: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any political subdivisions of the State of Arkansas (e.g., including but not limited to counties, cities, towns, municipalities and any of their elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain

which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 89: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Arkansas (including but not limited to any of its employees or departments).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 90: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any extension agents in the State of Arkansas (including but not limited to any of its employees or departments).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

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Request for Production No. 91: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the State of Oklahoma (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 92: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any political subdivisions of the State of Oklahoma (e.g., including but not limited to counties, cities, towns, municipalities and any of their elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 93: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any university or college in the State of Oklahoma (including but not limited to any of its employees or departments).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 94: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any extension agents in the State of Oklahoma (including but not limited to any of its employees or departments).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 95: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with the United States government (including but not limited to any of its elected officials, appointed officials, employees, departments, agencies, commissions, etc.).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 96: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any Farm Bureau (including but not limited to any of its employees).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting,

referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 97: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any Chamber of Commerce (including but not limited to any of its employees).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 98: Please produce all documents and materials reflecting, referring to or relating to any communications you have had regarding this lawsuit or the subject matter of this lawsuit with any poultry growers.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents “reflecting, referring to or relating to” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 99: Please produce all documents and materials reflecting, referring to or relating to Poultry Partners, Inc. (including but not limited to any of its officers, employees, attorneys or members).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad,

burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 100: Please produce all documents and materials reflecting, referring to or relating to the Poultry Community Council (including but not limited to any of its officers, employees, attorneys or members).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 101: Please produce all documents and materials reflecting, referring to or relating to Hall Estill or any of its attorneys.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 102: Please produce all documents and materials reflecting, referring to or relating to BMP's, Inc. or any of its officers or employees.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 103: Please produce all documents and materials reflecting, referring to or relating to any public statements, speeches, releases or communications you have made regarding this lawsuit or the subject matter of this lawsuit.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 104: Please produce all documents and materials reflecting, referring to or relating to any internal statements, speeches, releases or communications you have made regarding this lawsuit or the subject matter of this lawsuit.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 105: Please produce all documents and materials reflecting, referring to or relating to the nature or character of the legal relationship between you and your contract growers.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 106: Please produce all documents and materials reflecting, referring to or relating to any legal disputes or lawsuits regarding the nature or character of the legal relationship between you and your contract growers.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, self-evaluative, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 107: Please produce all documents and materials reflecting, referring to or relating to your net worth.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client or work product privileges; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order documents summarizing Cargill Turkey's net worth during the applicable time period. Cargill Turkey will

supplement this response to include other documents “reflecting, referring to or relating to” its net worth if Plaintiff will narrow this request by providing further specificity as to the particular information about which it inquires and the type of documents sought.

* * *

Request for Production No. 108: Please produce copies of any charts, diagrams or schematics reflecting your present and / or past corporate structure and relationship to any corporate affiliates.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client or work product privileges; and seeks all documents “reflecting” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order the organizational charts for Cargill Turkey, LLC during the applicable time period. Cargill Turkey will supplement this response to include other documents “reflecting, referring to or relating to” its corporate structure if Plaintiff will narrow this request by providing further specificity as to the particular information about which it inquires and the type of documents sought.

Request for Production No. 109: Please produce copies of any charts, diagrams or schematics reflecting the present and / or past management or organizational structures for those portions of your business relating, directly or indirectly, to poultry growing, as well as any charts, diagrams or schematics reflecting the personnel / employees holding positions within those structures.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client or work product privileges; and seeks all documents “reflecting” the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order the organizational charts for Cargill Turkey, LLC during the applicable time period. Cargill Turkey will supplement this response to include other documents “reflecting, referring to or relating to” its corporate structure if Plaintiff will narrow this request by providing further specificity as to the particular information about which it inquires and the type of documents sought.

Request for Production No. 110: Please produce copies of any charts, diagrams or schematics reflecting the present and / or past management or organizational structures for those portions of your business relating, directly or indirectly, to environmental issues, as well as any charts, diagrams or schematics reflecting the personnel / employees holding positions within those structures.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client or work product privileges; and seeks all documents "reflecting" or "relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order the organizational charts for Cargill Turkey, LLC during the applicable time period. Cargill Turkey will supplement this response to include other documents "reflecting, referring to or relating to" its corporate structure if Plaintiff will narrow this request by providing further specificity as to the particular information about which it inquires and the type of documents sought.

* * *

Request for Production No. 111: Please produce all documents and materials supporting or underlying the allegations made in paragraph 3 of the Third Party Complaint [DKT. #80].

Response: As Cargill Turkey is not a party to the referenced Third Party Complaint [DKT. #80], this request is unintelligible. However, to the extent Plaintiff intended to refer to similar allegations asserted in Cargill Turkey's Third Party Complaint [DKT. #82], Cargill Turkey responds as follows:

Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "supporting or underlying" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 112: Please produce all documents and materials reflecting, referring to or relating to the number of birds raised in the IRW each year (since 1952) by you or poultry growers under contract with you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client,

work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 113: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry manure produced per bird owned by you.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 114: Please produce all documents and materials reflecting, referring to or relating to the amount of poultry waste / poultry litter / poultry manure produced per year in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 115: Please produce all documents and materials reflecting, referring to or relating to the number of bird carcasses produced per year in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the meaning of the phrase "bird carcasses produced"; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 116: Please produce all documents and materials reflecting, referring to or relating to the disposal of bird carcasses produced in connection with your poultry growing operations (including poultry growing operations under contract with you) in the IRW each year (since 1952).

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome, vague, ambiguous and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; fails to define or explain the meaning of the phrase "bird carcasses produced"; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 117: Please produce all documents and materials reflecting, referring to or relating to the present environmental quality, character or condition of the lakes, rivers, streams and creeks located in the Oklahoma portion of the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and

protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 118: Please produce all documents and materials reflecting, referring to or relating to the historical environmental quality, character or condition of the lakes, rivers, streams and creeks located in the Oklahoma portion of the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 119: Please produce all documents and materials reflecting, referring to or relating to any advertising or public relations campaigns paid for you, directly or indirectly, in whole or in part, that address the environmental impact of poultry growing or poultry production.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 120: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on soils or lands located within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad,

burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 121: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on surface waters located within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 122: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on ground waters located within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

Request for Production No. 123: Please produce all documents and materials reflecting, referring to or relating to any testing or analyses performed by or on behalf of you on edge-of-field run-off from lands located within the IRW.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate

confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 124: Please produce all documents and materials reflecting, referring to or relating to any citations, tickets, fines, penalties or warnings issued to you or poultry growers under contract with you that pertain to actual or alleged run-off or discharge of poultry waste / poultry litter / poultry manure.

Response: Cargill Turkey objects to this request to the extent that it seeks confidential and proprietary trade secret or business documents without entry of an appropriate confidentiality and protective order. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it: seeks documents prior to 2002; seeks documents related to geographic areas outside the Illinois River Watershed; seeks information protected by the attorney client, work product, or joint defense privileges; seeks documents in the public domain which are equally available to Plaintiff as to Cargill Turkey; and seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey will produce upon entry of a mutually agreeable confidentiality and protective order all reasonably responsive, non-privileged documents that it has been able to locate as of the date of service of these responses.

* * *

Request for Production No. 125: Please produce all documents and materials reflecting, referring to or relating to the destruction of any documents and materials that would have been responsive, non-privileged to any of the above requests for production but due to their destruction are no longer in existence.

Response: Cargill Turkey objects to this request as vague, ambiguous and unintelligible. Cargill Turkey further objects to this request as overbroad, burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent that it seeks all documents "reflecting, referring to or relating to" the subject matter of this request. Subject to and without waiving these objections, Cargill Turkey states that it will produce its document retention policies as indicated in Cargill Turkey's response to Request No. 2 of Plaintiff's First Request for Production of Documents. As of the date of service of these responses, Cargill Turkey has not identified any other documents responsive, non-privileged to this request.

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

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